٢



FEDERAL ELECTION COMMISSION Washington, DC 20463

October 17, 1997

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Thomas J. Wong, Esq. Devens, Lo, Nakano, Saito, Lee & Wong 220 S. King Street, Suite 1600 Honolulu, Hawaii 96813

RE: MUR 4594

Longevity International Enterprises

Corporation

Dear Mr. Wong:

On December 6, 1996, your client, Longevity International Enterprises Corporation, was notified that the Federal Election Commission had found reason to believe your client violated 2 U.S.C. § 441e, a provision of the Federal Election Campaign Act of 1971, as amended. In a submission dated February 6, 1997, you presented legal and factual arguments and requested to enter into conciliation negotiations prior to a finding of probable cause.

The Commission has reviewed your request and determined to decline at this time to enter into conciliation prior to a finding of probable cause to believe because additional information is necessary.

Pursuant to its investigation of this matter, the Commission has issued the attached subpoena and order requiring your clients provide information. It is required that you submit all answers to questions under oath within 30 days of your receipt of this subpoena and order.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Nancy E. Bell Attorney

Enclosure
Subpoena and Order

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

MUR 4594

SUBPOENA TO PRODUCE DOCUMENTS ORDER TO SUBMIT WRITTEN ANSWERS

TO: Longevity International Enterprises Corporation c/oThomas J. Wong, Esq.
Devens, Lo, Nakano, Saito, Lee & Wong
220 S. King Street, Suite 1600
Honolulu, Hawaii 96813

Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment to this Subpoena. Legible copies which, where applicable, show both sides of the documents may be substituted for originals.

Such answers must be submitted under oath and must be forwarded to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463, along with the requested documents within 30 days of receipt of this Order and Subpoena.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his

hand in Washington, D.C., on this / Mh day of October

, 1997.

For the Commission,

ATTEST:

'Marjorie ₩ Emmons

Secretary to the Commission

Attachments:

Instructions/Definitions Interrogatories

Document Requests

Longevity International Entereses Corporation MUR 4594
Subpoena and Order
Page 3

INSTRUCTIONS

In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Documents previously produced in response to the Federal Election Commission's Subpoena To Produce Documents and Order to Submit Written Answers dated December 6, 1996 should not be resubmitted in response to these interrogatories and request for production of documents. These items should be listed and described in sufficient detail.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from January 1, 1984 to the present.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

Longevity International Enternation MUR 4594
Subpoena and Order
Page 4

DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"CAL" shall mean China Airlines, Ltd., or any entity associated, owned in part, and/or owned in whole by China Airlines, Ltd.

"Fasi" shall mean Friends for Fasi, Frank F. Fasi, or any other entity associated with Friends of Fasi and/or Frank F. Fasi.

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and request for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

INTERROGATORIES

- 1. Disclosed documents reveal that Fasi leased office space at the Chinatown Cultural Plaza Shopping Center ("Cultural Plaza") from 1981 through 1996. With respect to Fasi's use of property at the Cultural Plaza, describe the terms (including but not limited to the duration of occupancy, the rental price, the amount of space used (square feet), the payment for utilities and/or of any other services provided) of rental agreements, written or oral, for each year of tenancy, and:
- a. identify, by year, the Longevity International Enterprises Corporation ("Longevity") personnel who managed such office space;
- b. identify, by year, the individual(s) who negotiated the leasing agreement with Fasi for space at the Cultural Plaza for all years of tenancy.
 - c. state the amount paid to date for the use of such space.
- 2. Identify all other tenants, by category (commercial, charitable, etc.) in the Cultural Plaza who occupied space equal to and/or greater than 2,700 square feet, from 1984 through 1996, and provide the terms of their leases.
- 3. Identify all oral leases during the time period 1981 through 1996.
- 4. Answer the following questions regarding the status of Longevity.
- a. Identify by year all past and present holders of all classes of stock and/or shares of Longevity, including but not limited to the holders of common stock, capital stock, and corporate shareholders. Give the nationality, U.S. visa status (if applicable), place of employment, title and job description of each individual identified.
- b. Identify all Longevity management personnel. Give the nationality, U.S. visa status (if applicable), place of employment, title and job description of each individual identified.
- 5. Identify any loans and/or transfer of funds from CAL to Longevity.
- 6. Identify any transfer and/or sale of property from CAL to Longevity.
- 7. Identify any loans and/or transfer of funds from Longevity to CAL.
- 8. Identify any transfer and/or sale of property from Longevity to CAL.

- 9. Identify all previous or current Longevity managers, directors, or stockholders who hold or held positions at CAL.
- 10. Indicate whether the following individuals held or now hold a position at CAL and/or any other corporation. Provide the nationality, U.S. visa status (if applicable), current place of employment, and title and job description at CAL and/or the other corporation for each individual indicated:
 - a. Szeto Fu
 - b. Chang Lin-Teh
 - c. Chi-Tao Shan
 - d. Sherman S. M. Wang
 - e. Jen Fie Tun
 - f. Chock Tong Wong
 - g. Stanley S. C. Huang
- 11. Identify each person answering these questions, the length of time that he or she has been associated with the respondent, and all positions held with the respondent. Give the nationality, U.S. visa status (if applicable), place of employment, title and job description of each individual identified.

Longevity International Enterprises Corporation MUR 4594
Subpoena and Order
Page 7

REQUEST FOR DOCUMENTS

- 1. With respect to office space leased at the Cultural Plaza from 1981 through 1996:
- a. Produce all documents relating to any leases, written or oral, for space at the Cultural Plaza equal to or greater than 2,700 square feet, and;
 - b. Identify and produce all documents relating to Fasi.
- 2. Provide all documents related to any agreements or contracts which evidence the arrangement whereby CAL seconded employees to Longevity.
- 3. Provide all documents in your possession relating to CAL.
- 4. Provide all documents relating to Hsu Chun-I, Louis Chang and Karl C. P. Wang.
- 5. Provide all documents relating to any involvement by any personnel, officers, or directors of the Holiday Inn, Waikiki (formerly known as the Hawaii Dynasty Hotel) with Fasi.
- 6. Provide all documents evidencing arrangements and/or agreements for the transferring or seconding of funds, resources, and/or personnel between Longevity and CAL.
- 7. Provide resumes of all Longevity management personnel.